

UNITED STATES DISTRICT COURT

**SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE, TEXAS**

UNITED STATES OF AMERICA

Criminal Complaint

VS

TRUJILLO-Altamirano, Constantino
A201 721 395

Case Number 1: 19 PO 016

I, the undersigned being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 23, 2019 in Cameron County, in the SOUTHERN District of TEXAS, defendant, an alien, did

knowingly, willfully, and in violation of law attempt to gain illegal entry into the United States by a willful concealment of a material fact and in furtherance of such violation presented a birth certificate belonging to someone else,

in violation of Title 8 United States Code, Section(s) 1325 (a) (3).

I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendant attempted to gain illegal entry into the United States through the pedestrian primary lanes at the Gateway International Bridge in Brownsville, TX by falsely claiming to be a citizen of the United States and presenting a Commonwealth of Puerto Rico issued birth certificate bearing the name of Philip Michael Gonzalez Garcia to a Customs and Border Protection Officer. After further inspection, Customs and Border Protection Officers determined that the document presented by the defendant does not belong to him and that the defendant is a citizen and national of Mexico with no legal status to enter or to be in the United States.

Continued on the attached sheet and made a part hereof: :Yes X :No

/s/

Signature of Complainant
Armando Espinoza Jr.

Sworn to before me and subscribed in my presence,

March 25, 2019

Date

at

BROWNSVILLE, Texas

City and State

Ignacio Torteya III U.S. MAGISTRATE JUDGE

Name & Title of Judicial Officer

Signature of Judicial Officer